

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

SETH MARINOFF, Individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

REV GROUP, INC., TIM SULLIVAN, and
DEAN NOLDEN

Defendants.

Case No. 2:18-cv-1269-LA

RAMANITHARAN RAJARAM, Individually
and on behalf of all others similarly situated,

Plaintiff,

vs.

REV GROUP, INC., TIMOTHY W.
SULLIVAN, DEAN J. NOLDEN, THOMAS B.
PHILLIPS, PAUL BAMATTER, JEAN MARIE
CANAN, DINO CUSUMANO, CHARLES
DUTIL, JUSTIN FISH, KIM MARVIN, JOEL
ROTROFF, GOLDMAN SACHS & CO. LLC,
BMO CAPITAL MARKETS CORP.,
JEFFERIES LLC, STIFEL, NICOLAUS &
COMPANY, INCORPORATED, MORGAN
STANLEY & CO. LLC, ROBERT W. BAIRD
& CO. INCORPORATED, CREDIT SUISSE
SECURITIES (USA) LLC, DEUTSCHE BANK
SECURITIES INC., and WELLS FARGO
SECURITIES, LLC,

Defendants.

Case No. 2:18-cv-1270-LA

LEAH BITAR, Individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

REV GROUP, INC., TIMOTHY W.
SULLIVAN, DEAN J. NOLDEN, THOMAS B.
PHILLIPS, PAUL BAMATTER, JEAN MARIE
CANAN, DINO CUSUMANO, CHARLES
DUTIL, JUSTIN FISH, KIM MARVIN, and
JOEL ROTROFF,

Defendants.

Case No. 2:17-cv-1268-LA

**SECOND STIPULATION TO SET SCHEDULE FOR FILING OF AN AMENDED
COMPLAINT AND DEFENDANTS' RESPONSES THERETO**

This second Stipulation is made by and among lead plaintiff Houston Municipal Employees Pension System (“HMEPS”) and Defendants REV Group, Inc. (“REV Group”), Timothy Sullivan, Dean Nolden, Thomas Phillips, Paul Bamatter, Jean Marie Canan, Dino Cusumano, Charles Dutil, Justin Fish, Kim Marvin, Joel Rotroff, Goldman Sachs & Co. LLC, BMO Capital Markets Corp., Jefferies LLC, Stifel, Nicolaus & Co., Inc., Morgan Stanley & Co. LLC, Robert W. Baird & Co. Inc., Credit Suisse Securities (USA) LLC, Deutsche Bank Securities Inc., and Wells Fargo Securities, LLC (the “Stipulating Parties”), by and through their respective counsel.

RECITALS

WHEREAS the first-filed complaint in the above-captioned matters (the “Federal Actions”) was filed on June 8, 2018;

WHEREAS, on September 18, 2018, this Court issued an order consolidating the Federal Actions, appointing as lead plaintiff HMEPS pursuant to the Private Securities Litigation Reform Act of 1995, and appointing as lead plaintiff’s counsel the firms of Bernstein Liebhart LLP and Ademi & O’Reilly, LLP;

WHEREAS, in certain of the Federal Actions, the parties filed stipulations contemplating that the Defendants would not respond to the initial complaints, but would instead respond to an amended complaint filed by the court-appointed lead plaintiff, *see, e.g.,* Dkt. 24, *Rajaram v. REV Group, Inc., et al.*, Civ No. 2:18-cv-01270;

WHEREAS, Defendants have not yet answered or otherwise responded to the initial complaints;

WHEREAS, under Fed. R. Civ. P. Rule 15(a)(1), lead plaintiff may file an amended complaint as a matter of course;

WHEREAS, the parties filed a stipulated schedule for Lead plaintiff to file its amended complaint, as well as for briefing on Defendants' responses thereto, on October 1, 2018 (the "First Stipulation");

WHEREAS, the parties have agreed to slightly extend the deadlines in the First Stipulation; and

WHEREAS, the proposed schedule will not unreasonably delay the case because no scheduling order has been entered and the extension therefore does not impact any pending dates on the Court's calendar.

STIPULATION

THE STIPULATING PARTIES STIPULATE AND AGREE AS FOLLOWS:

1. Defendants are not required to answer or respond to the initial complaints filed in the Federal Actions.
2. Lead plaintiff shall file and serve an amended complaint on or before November 20, 2018.
3. Defendants shall move, answer or otherwise respond to the amended complaint on or before January 11, 2019.
4. If Defendants move to dismiss the amended complaint, lead plaintiff shall file and serve its opposition on or before February 28, 2019.
5. Defendants shall file and serve their reply to any opposition filed by lead plaintiff on or before March 29, 2019.
6. This Stipulation is without prejudice to any and all rights or defenses that the parties have under law.

IT IS SO STIPULATED:

Dated: November 7, 2018

/s/ Susan E. Lovern

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